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10 Attorneys for Defendants  
PANASONIC CORPORATION  
11 PANASONIC CORPORATION OF NORTH AMERICA

12  
13 UNITED STATES DISTRICT COURT  
14 NORTHERN DISTRICT OF CALIFORNIA  
15 SAN JOSE DIVISION  
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17 INNOVUS PRIME LLC,  
18 Plaintiff,  
19 v.  
20 PANASONIC CORPORATION, PANASONIC  
CORPORATION OF NORTH AMERICA,  
21 Defendants.  
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Case No. 12-0660 RMW

**DECLARATION OF DAVID L. YOHAI  
IN SUPPORT OF DEFENDANTS  
PANASONIC CORPORATION AND  
PANASONIC CORPORATION OF  
NORTH AMERICA'S MOTION FOR  
SUMMARY JUDGMENT**

Date: June 21, 2013  
Time: 9:00 a.m.  
Place: Courtroom 6  
Hon. Ronald M. Whyte

Complaint Filed: February 9, 2012

1 I, David L. Yohai, declare as follows:

2 1. I am an attorney with the law firm of Weil, Gotshal & Manges LLP, attorneys for  
3 Defendants Panasonic Corporation and Panasonic Corporation of North America (collectively  
4 “Panasonic”), and am fully aware of the facts and circumstances surrounding this matter. I make  
5 this declaration from my own personal knowledge and could competently testify to the facts  
6 discussed herein. I submit this declaration in support of Panasonic’s motion for summary  
7 judgment on Plaintiff Innovus Prime, LLC’s (“Innovus”) patent infringement claims asserted in  
8 its Complaint against Panasonic.

9 2. Although Plaintiff requested and received months of additional time to conduct  
10 depositions of Messrs. Tetsuyuki Watanabe and Ruud Peters, Plaintiff has failed to depose either  
11 individual.

12 3. Attached hereto as Exhibit 1 is a sealed and signed Certified Copy of U.S. Patent  
13 Number 5,280,350 from the United States Patent and Trademark Office.

14 4. Attached hereto as Exhibit 2 is a sealed and signed Certified Copy from the  
15 records of the United States Patent and Trademark Office of a document recorded on February 5,  
16 2008, reflecting the Assignment History of U.S. Patent Number 5,280,350.

17 5. Attached hereto as Exhibit 3 is a sealed and signed Certified Copy from the  
18 records of the United States Patent and Trademark Office of a document recorded on August 20,  
19 2008, reflecting the Assignment History of U.S. Patent Number 5,280,350.

20 6. Attached hereto as Exhibit 4 is a sealed and signed Certified Copy from the  
21 records of the United States Patent and Trademark Office of a document recorded on February  
22 13, 2010, reflecting the Assignment History of U.S. Patent Number 5,280,350.

23 7. Attached hereto as Exhibit 5 is a sealed and signed Certified Copy from the  
24 records of the United States Patent and Trademark Office of a document recorded on April 20,  
25 2011, reflecting the Assignment History of U.S. Patent Number 5,280,350.

26 8. Attached hereto as Exhibit 6 is a true and correct copy of the First Amended  
27 Complaint for Patent Infringement, dated October 29, 2011, in the action captioned *Innovus*  
28 *Prime LLC v. LG Electronics Inc., et al.*, Civil Action No. 11-04223 (JW).

DECLARATION OF DAVID L. YOHAI IN  
SUPPORT OF DEFENDANTS’ MOTION FOR  
SUMMARY JUDGMENT

